

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETSOCKET, INC.,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No. 2:22-CV-00172-JRG

**JURY TRIAL DEMANDED**

**JOINT MOTION TO AMEND THE DOCKET CONTROL ORDER**

Defendant Cisco Systems, Inc. (“Cisco”) and Plaintiff NetSocket, Inc. (“NetSocket”) hereby move this Court to amend the Fifth Amended Docket Control Order to extend certain pre-trial dates as shown in the attached proposed amended docket control order. The proposed schedule will not necessitate moving the deadlines for the pre-trial conference or trial.

The parties do not seek this extension for the purpose of delay, and indeed have been working collaboratively during a busy time. The requested extension is necessary to accommodate an unforeseen medical emergency that arose this past weekend. *See* Decl. of Sarah Piepmeier at ¶ 2-3. Specifically, on Saturday morning, May 11, 2024, a core member of Cisco’s Perkins Coie team was taken to the Emergency Room by ambulance after becoming unconscious and was subsequently admitted to the hospital. *Id.* at ¶ 2. Lead counsel for Cisco learned of the issue over the weekend and notified counsel for NetSocket early Monday morning. *Id.* at ¶¶ 3, 5. This team member has been working on the instant matter full time and is a key member of the team for Cisco; their medical situation is serious, and their doctor has indicated that they must immediately go on leave until the end of May. *Id.* at ¶¶ 2–4. Given the stage of this matter (imminent close of fact discovery), such an absence causes unavoidable disruption. *Id.* at ¶ 4.

The parties jointly seek to extend deadlines by approximately two weeks to permit Cisco's team to bring in new team members to cover for their colleague. *Id.* at ¶ 6. The parties therefore respectfully request that the Court enter the attached proposed amended docket control order.

Dated: May 16, 2024

Respectfully submitted,

/s/ Oded Burger

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**CERTIFICATE OF CONFERENCE**

The undersigned counsel hereby certifies that counsel for the Defendant met and conferred with counsel for Plaintiff pursuant to Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

/s/ Sarah E. Piepmeier

Sarah E. Piepmeier

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was filed electronically on May 16, 2024, pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service via the Court's CM/ECF system.

/s/ Sarah E. Piepmeier

Sarah E. Piepmeier